

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

UNITED STATES OF AMERICA ex rel.
CORI RIGSBY and KERRI RIGSBY

RELATORS/COUNTER-DEFENDANTS

v.

CASE NO. 1:06cv433-HSO-JCG

STATE FARM FIRE AND CASUALTY COMPANY DEFENDANT/COUNTER-PLAINTIFF

**STATE FARM FIRE AND CASUALTY COMPANY'S
MOTION TO COMPEL ARBITRATION AND TO STAY PROCEEDINGS**

Pursuant to the Federal Arbitration Act, the Arrangement, and applicable law, Defendant State Farm Fire and Casualty Company ("State Farm") submits this motion to compel arbitration of the False Claims Act ("FCA") claims in the [1623] Second Amended Complaint and to stay all proceedings with respect to the FCA claims until after this Court has ruled upon this motion to compel and any resulting arbitration has concluded. State Farm would show:

1. State Farm incorporates by reference its concomitant memorandum of authorities, including all argument, authority, and evidence set forth therein.

2. Pursuant to a written agreement between State Farm and the United States, State Farm is authorized to inform the Court that the United States does not oppose this motion to compel arbitration and to stay the proceedings.

3. State Farm further relies on the exhibits annexed to this motion.

WHEREFORE, PREMISES CONSIDERED, for the foregoing reasons, State Farm respectfully submits that this Court should grant State Farm's motion to compel arbitration and to stay all proceedings. State Farm also prays for such additional, alternative, or supplemental relief as may be appropriate in the premises.

This the 13th day of April, 2021.

Respectfully submitted,

STATE FARM FIRE AND CASUALTY COMPANY

By: s/ E. Barney Robinson III (MB # 09432)
Michael B. Beers, PHV (ASB-4992-S80M)
Phil B. Abernethy (MB # 1023)
E. Barney Robinson III (MB # 09432)
Amanda B. Barbour (MB # 99119)
Michael C. McCabe, Jr. (MB # 101548)
Douglas W. Baruch, PHV (DC Bar # 414354)
Jennifer M. Wollenberg, PHV (DC Bar # 494895)
ITS ATTORNEYS

OF COUNSEL:

Butler Snow LLP
Post Office Drawer 4248
Gulfport, MS 39502
(P) (228) 575-3025
(E) michael.mccabe@butlersnow.com

Butler Snow LLP
250 Commerce Street, Suite 203
Montgomery, AL 36104
(P) (334) 832-2900
(F) (334) 832-2901
(E) michael.beers@butlersnow.com

Butler Snow LLP
200 Renaissance at Colony Park, Suite 1400
1020 Highland Colony Parkway (39157)
Post Office Box 6010
Ridgeland, MS 39158-6010
(P) (601) 948-5711
(F) (601) 985-4500
(E) phil.abernethy@butlersnow.com
(E) barney.robinson@butlersnow.com
(E) ben.watson@butlersnow.com
(E) amanda.barbour@butlersnow.com

Morgan Lewis & Bockius LLP
1111 Pennsylvania Ave., NW
Washington, D.C. 20004-2541
(P) (202) 739-5219
(F) (202) 739-3001
(E) douglas.baruch@morganlewis.com
(E) jennifer.wollenberg@morganlewis.com

CERTIFICATE OF SERVICE

I, E. Barney Robinson III, one of the attorneys for State Farm Fire and Casualty Company, do hereby certify that I have this day caused a true and correct copy of the foregoing instrument to be delivered to the following via the means directed by the Court's CM/ECF System:

C. Maison Heidelberg
Chadwick M. Welch
HEIDELBERG PATTERSON WELCH PLLC
207 West Jackson Street
Ridgeland, MS 39157
(P) 601-790-1588
(F) 601-932-4400
mheidelberg@hpwlawgroup.com
gkennedy@hpwlawgroup.com

August J. Matteis Jr.
William E. Copley
Derek Y. Sugimura
Timothy M. Belknap
WEISBROD, MATTEIS & COPLEY, PLLC
1200 New Hampshire Avenue, NW, Suite 600
Washington, DC 20036
amatteis@wmclaw.com
wcopley@wmclaw.com
dsugimura@wmclaw.com
tbelknap@wmclaw.com

COUNSEL FOR CORI RIGSBY AND KERRI RIGSBY

Jay D. Majors
UNITED STATES DEPARTMENT OF JUSTICE
Civil Division
P.O. Box 261
Ben Franklin Station
Washington, DC 20044
(P) (202) 307-0264
(F) (202) 514-0280

Lynn Murray
AUSA
UNITED STATES ATTORNEY'S OFFICE
Southern District of Mississippi
501 East Court Street, Suite 4.430
Jackson, MS 39201
(P) (601) 965-2835
lynn.murray@usdoj.gov

ATTORNEYS FOR THE UNITED STATES

THIS the 13th day of April, 2021

By: s/*E. Barney Robinson III* (MB # 09432)
E. Barney Robinson III (MB # 09432)

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